

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

EDITH HARRIS, Plaintiff, vs. NOVARTIS PHARMACEUTICALS CORPORATION, Defendant.	Case Number: 4:21-cv-3013
JUDY COHEN, Plaintiff, vs. NOVARTIS PHARMACEUTICALS CORPORATION, Defendant.	Case Number: 4:21-cv-3014
CONSTANCE SUNDELL, Plaintiff, vs. NOVARTIS PHARMACEUTICALS CORPORATION, Defendant.	Case Number: 8:21-cv-32

**CONSENT MOTION TO EXTEND TIME TO FILE RESPONSES TO DEFENDANT'S
MOTIONS TO CERTIFY ORDER UNDER 28 U.S.C. §1292(b) FOR INTERLOCUTORY
APPEAL AND FOR STAY OF PROCEEDINGS**

COMES NOW Plaintiffs JUDY COHEN, EDITH HARRIS, AND CONSTANCE
SUNDELL with the consent of Defendant, by and through respective counsel of record and

pursuant to Federal Rule of Civil Procedure 6(b), do hereby submit the instant Consent Motion to Extend Time to File Responses to Defendant's Motions to Certify Order Under 28 U.S.C. §1292(b) for Interlocutory Appeal and for Stay of Proceedings. Plaintiffs state the following in support thereof:

1. On September 22, 2021, Defendant filed substantively similar Motions to Certify Order Under 28 U.S.C. §1292(b) for Interlocutory Appeal and for Stay of Proceedings and memoranda in support thereof in the above captioned cases.
2. The last day for Plaintiffs to file their opposition briefs is October 6, 2021.
3. Plaintiffs seek an extension in order to fully assess and respond to the aforementioned motions and memoranda in support.
4. The parties have agreed to extend the time for Plaintiffs to respond to October 20, 2021. This is the first request for an extension to respond in any of these cases.
5. In addition to the above, Defendant has requested an extension of time to file the Initial Disclosures until the Rule 26(f) Reports are due for the above captioned cases. Plaintiffs consent to this extension.

WHEREFORE, Plaintiffs requests that this Court issue an Order extending the time to October 20, 2021, to respond to Defendant's Motions to Certify Order Under 28 U.S.C. §1292(b) for Interlocutory Appeal and for Stay of Proceedings and continuing the deadlines for the initial

disclosures until such time as the Rule 26(f) Reports are due.

Dated: October 1, 2021

/s/ Brandon L. Bogle

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